



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

May 21, 2021

VIA ECF

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *Yang v. Garland, et al.*, No. 21 Civ. 3480 (RA)**

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate her Application to Register Permanent Residence or to Adjust Status (Form I-485). The Court has scheduled an initial conference in this case for May 28, 2021, with preconference submissions due today. The government's response to the complaint is due on June 25, 2021. On behalf of the government, I write respectfully to request an on-consent extension of time of approximately one month to respond to the complaint (*i.e.*, to July 26, 2021). I also respectfully request that the May 28 initial conference be adjourned to the week of August 7, 2021 or thereafter.

The extension is respectfully requested because USCIS has issued a Request for Evidence relating to the Form I-485. Although the response to the RFE is not due until August 16, 2021, the government understands that the plaintiff may be able to respond more quickly and that USCIS may be able to proceed to take adjudicative action within the requested extended period, which potentially would render this action moot. This is the government's first request for an extension of the deadline to respond to the complaint and to adjourn the initial conference. Plaintiff's counsel consents to these requests.

I thank the Court for its consideration of this letter and respectfully request that the Court accept it in lieu of the parties' preconference submissions.

Application granted. The initial pretrial conference is hereby adjourned until August 13, 2021 at 2:30 p.m.

SO ORDERED.

Hon. Ronnie Abrams  
May 25, 2021

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

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cc: Counsel of record (via ECF)